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cc: Skip Matthews <mtc@mchsi.com>, Karen Florini <KFlorini@environmentaldefense.org>, Richard Denison <rdenison@environmentaldefense.org>
bcc:
Subject: Environmental Defense comments on the Ring Substituted Anilines Category

(Submitted via Internet 9/8/06 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and len_sweet@albemarle.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for the **Ring Substituted Anilines Category.**

The Albemarle Corporation, in response to EPA's High Production Volume (HPV) Chemical Challenge, submitted a test plan and robust summaries for the Ring Substituted Anilines Category. The category includes one HPV Challenge chemical (2,6-diethyl aniline), one Extended HPV Program chemical (ortho-ethyl aniline), and two OECD SIDS chemicals (2,6 methyl ethyl aniline and aniline). We agree that this group of chemicals constitutes a category and that studies described in this submission address, directly and/or by read-across, the required SIDS elements for the category.

Chemicals in this category have a long history of use as chemical intermediates and have been subjects of considerable previous study. Numerous studies described in the well-referenced test plan and robust summaries indicate these chemicals appear not to accumulate in the environment and to have moderate to low toxicity to mammals, but considerably higher toxicity to aquatic organisms.

According to this submission, human exposure is largely limited primarily to the workplace, where the sponsor maintains appropriate industrial hygiene is enforced, or recommended. No information is provided regarding possible sources of environmental exposure to these chemicals as a result of their manufacture, transport or use. Given that these chemicals have significant toxicity to aquatic organisms, it would be helpful if this submission included some description of the production, transport and use of these chemicals and measures taken to prevent their release into the environment. Also, this submission states that chemicals in this category are used "primarily" as synthetic intermediates. Therefore, it may be assumed that "some quantities" of these chemicals are in uses other than as synthetic intermediates. No direct uses or levels of these chemicals in finished products are described, however. Direct uses, and other possible sources of human and environmental exposure, if any, should be described as well.

The robust summaries contained in this submission consist primarily of data packages previously submitted in accordance with OECD SIDS and IUCLID guidelines. Our review of these data indicates that the data provided in these submissions are sufficient to address the SIDS elements required under the HPV Challenge. No further testing should be required for chemicals in this category.

Thank you for this opportunity to comment.

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